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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New  
York non-profit corporation, and WR PROPERTY  
LLC, a New Jersey limited liability company,

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,  
MICHAEL REINA, ROBERT NIXON, HELENE  
SCHLEGEL, JEFFREY PURPURO, WILLIAM  
CAMPBELL, and KENNETH PIESLAK,

Defendants.

Civ. No. 3:17-DV-03226

**DECLARATION OF ANDREW MOZES**

ANDREW MOZES declares as follows, pursuant to 28 U.S.C. § 1746:

1. I live at 33 Rutgers Road in Jackson Township, New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am a member of Agudath Israel.
4. My religious beliefs prohibit me from pushing a stroller or a wheelchair or carrying food, medication, canes, water bottles, house keys, personal identification, books, prayer shawls and/or reading glasses outside of my home on the Sabbath and on holy days, unless there is an *eruv*, an area enclosed by a wire boundary that symbolically extends the private domain of Jewish households into public areas.
5. There is no *eruv* in my neighborhood and Jackson has passed an ordinance prohibiting the installation of an *eruv*.
6. The lack of an *eruv* hampers my ability to practice my religious beliefs in multiple ways, including:
  - a. It is my religious belief that I should bring my children to shul on the sabbath and on holy days for at least a portion of the day. However, my one year old son cannot walk to the shul. He must go in a stroller or be carried. Because there is no *eruv*, we cannot push a stroller or carry my son and we are unable to bring him to shul and my wife must stay home with him and is unable to attend shul.
  - b. It is my religious belief that I must study with others on the sabbath. Without an *eruv* I can not carry my books to shul. By not being able to carry my books, it hampers my ability to pray and study.
  - c. It is my religious belief that we must pass our traditions on to our children, *l'dor vador* (from generation to generation) and that my children should learn from

older family members. However, because there is no *eruv*, I cannot have my wife's grandfather who is in a wheelchair, join us for shabbos or for a holy day.

Because we can't push him to shul, he is unable to come to our house for shabbos.

7. The ordinances prohibiting an *eruv* do not affect my neighbors who are not Orthodox Jews because they are permitted to push strollers and travel to their houses of worship and families with or without an *eruv*. The prohibition on the *eruv* only affects Orthodox Jews.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 8, 2019



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ANDREW MOZES